

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. 06-</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: _____</b>
<b>THI LUYEN LE,</b>	<b>:</b>	<b>VIOLATIONS:</b>
<b>a/k/a LINH,</b>	<b>:</b>	<b>21 U.S.C. § 952(a) (importation of MDA</b>
<b>VINH GIA HIEP NGUYEN</b>	<b>:</b>	<b>and methamphetamine – 1 count)</b>
<b>MAURICE ERIC EVANS</b>	<b>:</b>	<b>21 U.S.C. § 841(a)(1) (distribution of</b>
	<b>:</b>	<b>MDA and methamphetamine – 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 1956(h) (conspiracy to</b>
	<b>:</b>	<b>launder monetary instruments – 1 count)</b>
		<b>18 U.S.C. § 2 (aiding and abetting)</b>

**INDICTMENT**

**COUNT ONE**

**(Importation of MDA and Methamphetamine)**

**THE GRAND JURY CHARGES THAT:**

In or about mid-March 2006, in the Eastern District of Pennsylvania and elsewhere, defendant

**THI LUYEN LE,**  
**a/k/a LINH,**

knowingly and intentionally imported from Canada to the Eastern District of Pennsylvania in the United States, and aided and abetted the importation of, a mixture and substance consisting of approximately 130,520 pills and weighing more than 500 grams, that is, approximately 39 kilograms, containing a detectable amount of a controlled substance, specifically:

- (a) methamphetamine, a Schedule II controlled substance, that is, approximately 195 grams of pure methamphetamine, and

- (b) 3,4-methylenedioxyamphetamine, commonly known as MDA and/or “ecstasy,” a Schedule I controlled substance, that is approximately 4,644 grams of pure MDMA.

In violation of Title 21 United States Code, Sections 952(a), 960(a), 960(b)(1)(H) and 960(b)(3), and Title 18 United States Code, Section 2.

**COUNT TWO**

**(Distribution of MDA and Methamphetamine)**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 28, 2006, in the Eastern District of Pennsylvania and elsewhere, defendants

**THI LUYEN LE,  
a/k/a LINH,  
VINH GIA HIEP NGUYEN, and  
MAURICE ERIC EVANS,**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance consisting of approximately 39 kilograms, containing a detectable amount of a controlled substance, specifically:

- (a) methamphetamine, a Schedule II controlled substance, that is, approximately 195 grams of pure methamphetamine, and
- (b) 3,4-methylenedioxyamphetamine, commonly known as MDA and/or “ecstasy,” a Schedule I controlled substance, that is approximately 4,644 grams of pure MDMA.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(viii) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

**COUNT THREE**

**(Conspiracy to Launder Monetary Instruments)**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. On or about March 28, 2006, in Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendants

**THI LUYEN LE,  
a/k/a LINH, and  
VINH GIA HIEP NGUYEN,**

conspired and agreed together and with other persons known and unknown to the grand jury, to knowingly transport and transfer monetary instruments and funds, that is, \$500,000 of United States currency from a place in the United States to a place outside the United States, that is, Canada, with the intent to promote the carrying on of specified unlawful activity, specifically, the importation of controlled substances in violation of 21 U.S.C. § 952(a) and the distribution of controlled substances in violation of 21 U.S.C. § 841(a)(1), all in violation of Title 18, United States Code, Section 1956(a)(2)(A).

**MANNER AND MEANS**

It was part of the conspiracy that:

2. Following the distribution in Philadelphia, Pennsylvania of approximately 130,520 pills containing detectable amounts of controlled substances, namely, methamphetamine and 3,4-methylenedioxyamphetamine, commonly known as MDA and/or “ecstasy,” payment of \$500,000 for the pills was to be taken by the purchaser to defendant VINH GIA HIEP NGUYEN in Harrisburg, Pennsylvania.

3. Defendant VINH GIA HIEP NGUYEN was to take physical delivery of the

payment money for the controlled substances in the vicinity of Harrisburg, PA on behalf of defendant THI LUYEN LE.

4. Thereafter, defendant VINH GIA HIEP NGUYEN was to follow directions to have the \$500,000 transported to Canada as directed by defendant THI LUYEN LE.

In violation of Title 18, United States Code, Section 1956(h).

**A TRUE BILL:**

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**FOREPERSON**

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**PATRICK L. MEEHAN**  
**United States Attorney**  
**Eastern District of Pennsylvania**